

REMARKS

In the Office Action, the Examiner rejected claims 12-31 and allowed claims 1-11. Applicants thank the Examiner for noting the allowable subject matter of the instant claims. Applicants note that claim 30 was cancelled without prejudice in a previous Response. Accordingly, claims 1-29 and 31 remain pending in the present application. In light of the following remarks, Applicants respectfully request reconsideration and allowance of the instant claims.

Rejections Under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claim 12 under 35 U.S.C. §102(b) as being anticipated by the Seto et al. reference (U.S. Patent No. 6,175,488).

Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). In order to maintain a proper rejection under section 102, a single reference must teach each and every element or step of the rejected claim. *See Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Indeed, “[t]he identical invention must be shown in as complete detail as is contained in the...claim.” *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q. Rd 1913, 1920 (Fed. Cir. 1989).

By way of example, an embodiment of the present invention comprises a force-actuated coupling mechanism and at least one coupling mechanism that is cooperative with the force-actuated coupling mechanism to mount a component cover detachably to the device housing. The cover 42 of the discussed embodiment in the application includes a flexible catch 68, as best illustrated in Figure 6 of the present application. *See Application, Fig. 6; see also Application, page 9, lines 15-17.* The flexible catch 68 includes a hook portion 70 that interacts with a catch opening 66 on the top deck 20 of the device housing. *See id.*, lines 17-19. To release the flexible catch 68, a user may apply pressure to the surface 46 of the component cover 42 disengages the hook portion 70 with respect to the catch opening 66. *See id.*, page 9, lines 21-23; page 10, lines 1-2. Accordingly, by applying a force to the top surface 46 of the cover 42, a user may actuate the flexible member 68 to detach the cover 42 from the electronic device housing 20. *See id.* With this in mind, Applicants respectfully assert that the Seto reference fails to disclose all of the features recited in the instant claims.

Independent Claim 12 and The Claims Depending Therefrom

Independent claim 12 recites, *inter alia*,

a force-actuated coupling mechanism; and

at least one coupling mechanism *cooperative* with the
force-actuated coupling mechanism to mount the
component cover detachably to the device housing.

(Emphasis added). Applicants respectfully assert that the Seto reference fails to disclose all of these recited features.

In the Office Action, the Examiner argued that the coupling members 65a and 65b are cooperative with latches 63a and 63b to mount cover 21 detachably to housing 4,b of Seto. *See* Paper No. 4, page 3. Applicants respectfully traverse this argument. A careful reading of the Seto reference clearly indicates that the coupling members 65a and 65b only function to maintain a *loose/flexible* linkage between the cover 21 and the housing 4,b in an *open position* of the cover 21. *See* Seto, Figs 1, 7A-7B; column 8, lines 37-49. However, this *loose linkage* of the members 65a and 65b is absolutely incapable of *cooperating* with the latches 63a and 63b to mount the cover 21. When the front cover 21 is in a closed configuration, the coupling members 65a and 65b are completely irrelevant to the mounting of the front cover 21 to the body 20. Thus, the coupling members 65a and 65b *do not cooperate* with any other mechanism of the Seto device *to mount* the component cover with respect to the housing body. Rather, the coupling members 65a and 65b of the Seto device merely prevent uncoupling at the front cover 21 from the housing body 20 when in the open configuration. Therefore, the Seto reference is absolutely devoid of any teaching of a coupling mechanism *cooperative* with a force-actuated coupling mechanism *to mount* a component cover detachably to a device housing, as recited in the instant claims.

Furthermore, when the front cover of the Seto device 21 is in an open configuration with respect to the housing body 20 “the front cover *is not completely separated* from the housing 4 since it is coupled to the housing body 20 by means of the coupling members 65a and 65b.” *See* Seto, column 9, lines 65-67; column 10, lines 1-5. (Emphasis added). Moreover, stopper portions 71 and 75 in the Seto device *prevent* the body 66 (i.e., the body 66 of coupling members 65a and 65b) from being removed from the slits 70 and 74. *See id.*, column 8, lines 63-65; column 9, lines 13-15. Accordingly, when in the open configuration, the front cover 21 of the

Seto device is *always* coupled to its housing body 20. This continuous engagement in the Seto device clearly demonstrates that the front cover 31 is not *detachable* with respect to its housing body 20. At best, the cover 21 of the Seto device is positionable, while *continuously attached*, with respect to the housing body 20.

Moreover, the Seto device includes a cable 58 that is coupled to the front cover 21 as well as a connector 60, which is located within the housing body 20 of the computer device. *See id.*, Figs. 3-4. To prevent damage of this cable 58 when the front cover 21 of the Seto device is in the open position, Seto state “the length of the coupling members 65a, 65b is set to be less than the entire length of the cable member connecting the click switches 56A and 56B and circuit board 14.” *See* Seto, column 9, lines 23-27. This dimensioning of the coupling member 65a and 65b clearly demonstrates that the front cover 21 of the Seto device is *not detachable* from the housing body 20. Therefore, Applicants respectfully assert that the Seto reference is absolutely devoid of a coupling mechanism cooperative with a force-actuated coupling mechanism to mount a component cover *detachably* to a device housing, as recited in the instant claims.

Therefore, Applicants respectfully assert that the cited Seto reference fails to anticipate the instant claim, because the cited reference does not disclose all of the features recited in the instant claim. Accordingly, Applicants respectfully request reconsideration and allowance of the instant claim.

Rejections Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected claims 13-15, 19, 22-25 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over the embodiment illustrated in Figs. 1-7 of the Seto reference in view of the embodiments illustrated in Figs. 8-10 of the Seto reference.

Additionally, the Examiner rejected claims 16-18, 20, 21, 26, 27, and 31 under 35 U.S.C. § 103(a) as being unpatentable over both embodiments of the Seto reference. Applicants respectfully transverse the rejections. In summary, Applicants respectfully assert that the embodiments of the Seto reference, taken alone or in combination, fail to disclose all of the features recited in the instant claims.

The burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (PTO Bd. App. 1979). If the Examiner modifies the teachings of the prior art to produce the claimed invention, a *prima facie* case of obviousness cannot be established absent some teaching or suggestion supporting the modification. *See ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984). Accordingly, to establish a *prima facie* case, the Examiner must not only show that the modification includes *all* of the claimed elements, but also a convincing line of reason as to why one of ordinary skill in the art would have found the claimed invention to have been obvious in light of the teachings of the reference. *See Ex parte Clapp*, 227 U.S.P.Q. 972 (B.P.A.I. 1985).

Dependent Claims Depending from Independent Claim 12

Dependent claims 13-21 each depend from independent claim 12. In the Seto reference, the devices of both embodiments (i.e., the embodiments illustrated in Figs. 1-7 and the

embodiments illustrated in Figs. 8-10) employ coupling members 65a and 65b, which provide a *loose/flexible* linkage between the front cover 21 and the respective housing body 20 to maintain attachment of the cover 21 when in an open configuration. *See* Seto, Figs. 7A-7B and 9. As discussed above, the coupling members 65a and 65b fail *to cooperate* with any mechanism of the Seto device *to mount* the front cover 21 to the housing body 20. More specifically, the coupling members 65a and 65b do not *cooperate* with latches 63a and 63b *to mount* the front cover 21 to the housing body 20.

Additionally, as also discussed above, the stoppers 71 and 75 *prevent* uncoupling of the coupling mechanisms 65a and 65b with respect to the housing body 20 and the front cover 21. Accordingly, the front cover 21 of the Seto device *always remains coupled to* its housing body 20. Therefore, the Seto reference is absolutely devoid of any semblance of a coupling mechanism that *detachably mounts* the front cover 21 to the housing body 20. With the foregoing remarks in mind, Applicants respectfully assert that the Examiner has failed to present a *prima facie* case of obviousness regarding the instant claims, because the Seto reference fails to disclose all of the features recited in the instant claims. Accordingly, Applicants respectfully request reconsideration and allowance of the instant claims.

Independent Claim 22 and the Claims Depending Therefrom

Independent claim 22 recites, inter alia,

providing a *detachable* quick-release cover for the portable computer housing to cover the opening.

(Emphasis added). Applicant respectfully asserts that the Seto reference fails to disclose all of these recited features.

As discussed above, the Seto reference is absolutely devoid of any semblance of a cover that is *detachable* with respect to its housing. Rather, the front cover 21 of the Seto device is *always* coupled to its housing body 20 via the coupling members 65a and 65b. Therefore, Applicants respectfully assert that the Seto reference fails to disclose all of the features recited in the instant claims. Thus, Applicants respectfully assert that the Examiner has failed to establish a *prima facie* case of obviousness regarding the instant claim. Moreover, Applicants respectfully assert that dependent claims 23-28 are patentable over the Seto reference not only for their dependency upon an allowable base claim, but also by virtue of the additionally features recited therein. In light of the foregoing remarks, reconsideration and allowance are respectfully requested.

Independent Claim 29 and The Claims Depending Therefrom

Independent claim 29 recites, *inter alia*,

means for *detachably coupling* a cover to the portable computer housing to cover the opening.

(Emphasis added). Applicants respectfully assert that the Seto reference fails to disclose all of the features recited in the instant claim.

As discussed above, the front cover 21 of the Seto reference is *always* coupled to the housing body 20 via a pair of coupling members 65a and 65b. Moreover, the Seto reference

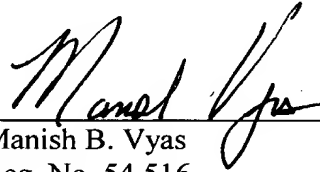
teaches that stoppers 71 and 75 prevent disengagement of the body 66 of the coupling members 65a and 65b from disengaging with respect to the front cover 21 and the housing body 20.

Accordingly, the Seto reference is absolutely devoid of any semblance of a cover that *detachably* couples to a computer housing, as recited in the instant claim. Therefore, Applicants respectfully assert that independent claim 29 and its respective dependent claim 30 are not rendered obvious by the Seto reference and that the Examiner has failed to present a *prima facie* case of obviousness. In light of the foregoing remarks reconsideration and allowance are respectfully requested.

Conclusion

In view of the remarks set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Manish B. Vyas
Reg. No. 54,516
(281) 970-4545

Date: January 9, 2004

Correspondence Address:
Hewlett-Packard Company
IP Administration
Legal Department, M/S 35
P.O. Box 272400
Fort Collins, CO 80527-2400